

HICKS THOMAS LLP
A REGISTERED LIMITED LIABILITY PARTNERSHIP

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July 18, 2014

Regional Freedom of Information Officer
U.S. EPA, Region 2
290 Broadway, 26th Floor
New York, NY 10007-1866

Re: *Suffolk County Water Authority v. The Dow Chemical Company, et al.*
Index No. 024852/2010; FOIA Request for Records

Dear Sir/Madam:

Please provide us with the USEPA records pertaining to the Blydenburgh Landfill/Islip Municipal Sanitary Landfill, 440/600 Blydenburgh Road, Hauppauge, New York ("Blydenburgh"), EPA ID: NYD980506901, including but not limited to all:

1. Documents¹ in your possession, custody and control concerning or relating to the presence or detection of PCE² at Blydenburgh from 1970 to the present.
2. Documents in your possession, custody and control concerning or relating to the source or sources of PCE at Blydenburgh from 1970 to the present.

¹ The term "Document" means all writings and recordings of any nature whatsoever within your possession, custody, or control or within the control of any director, officer, agent, employee, representative or other person acting or purporting to act for on your behalf, or in concert with you, including, but not limited to, contracts, agreements, leases, communications, correspondence, telegrams, memoranda, emails, records, reports, books, summaries or records of telephone conversations, summaries or records of personal conversations or interviews, diaries, forecasts, statistical statements, work papers, drafts, copies, graphs, charts, accounts, analytical records, minutes or records of meetings or conferences, consultants' or analysts' reports, appraisals, reports or summaries of negotiations, brochures, pamphlets, circulars, trade letters, press releases, newspaper or magazine articles, notes, marginal notations, bills, invoices, checks, photographs, lists, journals, computer tapes, disks or cards, electronic recordings and all other written, printed, recorded or photographic matter or sound reproductions, however, stored, produced or reproduced. The term "Document" specifically includes electronically stored information, including e-mail correspondence and computer files.

² The term "PCE" shall mean the chemical compound perchloroethylene, also known and referred to as PERC, tetrachloroethylene and tetrachloroethene, and its degradation products (i.e., trichloroethylene (TCE), dichloroethylene (DCE) and vinyl chloride.

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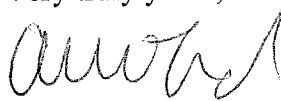
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3. Documents in your possession, custody and control concerning or relating to any corrective measure³ taken due to alleged contamination at Blydenburgh from 1970 to the present.
4. Documents reflecting communications between the EPA and the Suffolk County Water Authority relating to the presence of PCE at Blydenburgh from 1970 to the present.

If the cost of these documents will exceed \$500, please contact us for approval before making any copies. The records requested may be in electronic format where economical or practical.

Thank you for your prompt attention to this request. If you have any questions or concerns, please do not hesitate to contact us.

Very truly yours,



Allison Ford
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³ The term "Corrective Measure(s)" shall mean and include: (a) the design, construction, operation and maintenance of a treatment facility or equipment to remove or reduce the level of a contaminant in a well or water source; (b) the blending of water to remove or reduce the level of contaminant in a well or water source; (c) the destruction of a well or removal from service of a well as a result of a contaminant in a well or water source; (d) the reduction in use of a well as a result of a contaminant in a well or water source.